

Exhibit 19-2  
Citizen Participation Plan

6509.2 REV-5

Guide for Completeness Review of State Citizen Participation Plan			
Name of Program Participant:			
Staff Consulted:			
Date Plan Was Adopted or Last Amended:			
Name(s) of Reviewer(s):		Date:	

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

**Instructions:** This Exhibit is designed to review the State's compliance with the Citizen Participation Plan requirements under the Consolidated Plan regulations at 24 CFR Part 91, Subpart B. The Exhibit is divided into eight sections: Applicability and Adoption of the Citizen Participation Plan; Development of the Consolidated Plan; Consolidated Plan Amendments; Performance Reports; Citizen Participation Requirements for Local Governments; Availability to the Public; Access to Records; and Complaints.

**Questions:**

A. APPLICABILITY AND ADOPTION OF THE CITIZEN PARTICIPATION PLAN

1.

Does the State have a Citizen Participation Plan? [24 CFR 91.115(a)(1)]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

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2.

Was the Plan adopted by the State? [24 CFR 91.115(a)(1)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 100px; border: 1px solid black;"></div>		

3.

Does the Citizen Participation Plan provide for and encourage citizens, especially low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and residents of predominantly low- and moderate-income neighborhoods, to participate in the development of the Consolidated Plan? [24 CFR 91.115(a)(2)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 100px; border: 1px solid black;"></div>		

4.

Does the Citizen Participation Plan provide for and encourage citizens, especially those described in question “3” above, to participate in the development of any substantial amendments to the Consolidated Plan? [24 CFR 91.115(a)(2)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 100px; border: 1px solid black;"></div>		

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5.

Does the Citizen Participation Plan provide for and encourage citizens, especially those described in question “3” above, to participate in the development of the performance report? [24 CFR 91.115(a)(2)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		

6.

Does the Citizen Participant Plan include a definition of residents of “predominantly low- and moderate-income neighborhoods?” [24 CFR 91.115(a)(2)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		

7.

Are specific actions described to encourage participation by minorities, non-English speaking persons, and persons with disabilities? [24 CFR 91.115(a)(2)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		

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8.

Does the Citizen Participation Plan provide citizens and local governments with an opportunity to comment on the original Citizen Participation Plan and on substantial amendments to it? [24 CFR 91.115(a)(3)]	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>Yes</b>	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 100px; border: 1px solid black;"></div>		

B. DEVELOPMENT OF THE CONSOLIDATED PLAN

9.

Does the Citizen Participation Plan require that, before the State adopts a Consolidated Plan, the State will make available to citizens, public agencies, and other interested parties, information that includes: a) the amount of assistance the State expects to receive; and b) the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income, the plans to minimize displacement of persons and to assist any persons displaced, and c) when and how the State will make this information available? [24 CFR 91.115(b)(1)]	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>Yes</b>	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 150px; border: 1px solid black;"></div>		

<p>Does the Citizen Participation Plan require the State to publish the proposed Consolidated Plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments?          [24 CFR 91.115(b)(2)]</p>	<div> <input type="checkbox"/> <input type="checkbox"/> </div> <div> <b>Yes</b> <b>No</b> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

<p>Does the Citizen Participation Plan set forth:</p> <p>a) how the State will publish the proposed Consolidated Plan; and</p> <p>b) give reasonable opportunity to examine the contents of the proposed Consolidated Plan?</p> <p>[24 CFR 91.115(b)(2)]</p>	<div> <input type="checkbox"/> <input type="checkbox"/> </div> <div> <b>Yes</b> <b>No</b> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

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12.

If the Citizen Participation Plan says the State will publish a summary of the proposed Consolidated Plan, does the Citizen Participation Plan require the summary to: 1) describe the contents and purpose of the Consolidated Plan; and 2) include a list of the locations where copies of the entire proposed Consolidated Plan may be examined? [24 CFR 91.115(b)(2)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 150px; border: 1px solid black;"></div>			

13.

Does the Citizen Participation Plan state that the State will provide a reasonable number of free copies of the proposed Consolidated Plan to citizens and groups that request it? [24 CFR 91.115(b)(2)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 150px; border: 1px solid black;"></div>		

14.

Does the Citizen Participation Plan provide for at least one public hearing on housing and community development needs before the proposed Consolidated Plan is published for comment? [24 CFR 91.115(b)(3)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 150px; border: 1px solid black;"></div>		

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15.

Does the Citizen Participation Plan state how and when “adequate advance notice” of the Consolidated Plan hearing will be given to citizens? (Publishing small print notices in the newspaper a few days before the hearing does not constitute adequate notice. HUD does not specify the length of notice required, but would consider two weeks adequate.) [24 CFR 91.115(b)(3)(i)]	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>	

16.

Does the Citizen Participation Plan require notice of the hearing to include sufficient information published about the subject of the hearing to permit informed comment? [24 CFR 91.115(b)(3)(i)]	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>	

17.

<p>Does the Citizen Participation Plan:</p> <p>a) provide that the hearing be held at a time and location convenient to potential and actual beneficiaries;</p> <p>b) provide that the hearing will include accommodation for persons with disabilities, and</p> <p>c) specify how the hearing will meet these requirements?</p> <p>[24 CFR 91.115(b)(3)(ii)]</p>	<div> <input type="checkbox"/> <input type="checkbox"/> </div> <div> <b>Yes</b> <b>No</b> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

18.

<p>Does the Citizen Participation Plan identify how the needs of non-English speaking residents will be met in the case of a public hearing where a significant number of non-English speaking residents can be reasonably expected to participate?</p> <p>[24 CFR 91.115(b)(3)(iii)]</p>	<div> <input type="checkbox"/> <input type="checkbox"/> </div> <div> <b>Yes</b> <b>No</b> </div>
<p><b>Describe Basis for Conclusion:</b></p>	



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19.

Does the Citizen Participation Plan provide a period of not less than 30 days to receive comments from citizens and units of general local government on the Consolidated Plan? [24 CFR 91.115(b)(4)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		

20.

Does the Citizen Participation Plan require the State to consider any comments or views of citizens and units of general received in writing, or orally at the public hearings, in preparing the final Consolidated Plan? [24 CFR 91.115(b)(5)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		

C. CONSOLIDATED PLAN AMENDMENTS

21.

Does the Citizen Participation Plan specify the criteria the State will use for determining what changes in the State's planned or actual activities constitute a substantial amendment to the Consolidated Plan? [24 CFR 91.115(c)(1)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		

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22.

For <u>the CDBG program only</u> , does the Citizen Participation Plan include, among the criteria for a substantial amendment to the Consolidated Plan, changes in the method of distribution of such funds? [24 CFR 91.115(c)(1)]	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<b>Describe Basis for Conclusion:</b>          	

23.

Does the Citizen Participation Plan: a) provide citizens and units of general local government with reasonable notice and an opportunity to comment on substantial amendments to the Consolidated Plan, b) state how reasonable notice and an opportunity to comment will be given, and c) provide a period, not less than 30 days, to receive comments on the substantial amendment before amendments are implemented? [24 CFR 91.115(c)(2)]	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> <span>Yes</span> <span>No</span> </div>
<b>Describe Basis for Conclusion:</b>          	

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24.

Does the Citizen Participation Plan require the State to consider any comments or views of citizens and units of general local government received in writing, or orally at public hearings, if any, in preparing substantial amendments to the Consolidated Plan? [24 CFR 91.115(c)(3)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		

D. PERFORMANCE REPORTS

25.

Does the Citizen Participation Plan: a) provide citizens with reasonable notice and an opportunity to comment on performance reports, b) state how reasonable notice and an opportunity to comment will be given, and c) provide a period, not less than 15 days, to receive comments on the performance report before its submission to HUD? [24 CFR 91.115(d)(1)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>		

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26.

Does the Citizen Participation Plan require the State to consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report? [24 CFR 91.115(d)(2)]	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>Yes</b>	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 100px; border: 1px solid black;"></div>		

E. CITIZEN PARTICIPATION REQUIREMENTS FOR LOCAL GOVERNMENTS

27.

For the CDBG program only, does the Citizen Participation Plan describe the citizen participation requirements for units of general local government receiving CDBG funds from the State in 24 CFR 570.486, and explain how the requirements will be met? [24 CFR 91.115(e)]	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>Yes</b>	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>No</b>	<input style="width: 30px; height: 20px;" type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b> <div style="height: 100px; border: 1px solid black;"></div>			

28.

## G. ACCESS TO RECORDS

29.

09/2005

H. COMPLAINTS

30.

Does the Citizen Participation Plan describe the State's appropriate and practicable procedures to handle complaints from citizens related to the Consolidated Plan, amendments, and performance reports which, at minimum, require a timely, substantive written response to every citizen complaint within an established period of time? [24 CFR 91.115(h)]	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b>
<b>Describe Basis for Conclusion:</b>	

31.

For <u>the CDBG program only</u> , is the specified time period for providing a substantive written response to a citizen complaint “within 15 working days, where practicable?” [24 CFR 91.115(h)]	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>	